

States Government

Department of Energy

Rocky Flats Office

memorandum

APR 10 1 29 PM '91

APR 11 1991

WMED:JR:2705

Clarification of Water Transfer Conditions

J. M. Kersh, Associate General Manager
Environmental Restoration and Waste Management
EG&G Rocky Flats, Inc.

Recently, your staff has asked us to contact the U.S. Environmental Protection Agency (EPA), Region VIII to obtain clarification of the conditions under which water may be transferred on Plantsite from one series of holding ponds to another. This clarification was made necessary by the recent signing of the Federal Facility Compliance Agreement (FFCA), which established new monitoring and reporting requirements for our discharges, and by the fact that certain recent water management actions (namely, the consolidation of treatment and discharge at Terminal Pond A-4) are not accounted for in either the FFCA or our current National Pollutant Discharge Elimination System (NPDES) permit. Specifically, your staff asked for guidance regarding the transfer between Terminal Pond A-4 and Terminal Pond B-5, and for planned transfers between Ponds B-1 and B-2 and Pond A-2.

On April 5, 1991, John Rampe of my staff spoke with Mr. Bob Shankland of EPA. Regarding the B-5 to A-4 transfer, we forwarded the concern that, since discharges from B-5 were, under the terms of the FFCA, more heavily regulated (in terms of effluent limitations and monitoring and reporting requirements) than discharges from Pond A-4, the transfer of water from B-5 to A-4 may be prohibited by Part III.1.a. of the Rocky Flats NPDES permit. This part of the permit prohibits transfer from one series of ponds to another if the discharge will occur at an outfall that has less stringent effluent requirements. We suggested to Mr. Shankland that, when B-5 is transferred to A-4, monitoring take place at B-5 as if it were being discharged. Mr. Shankland concurred with our suggestion. Please note that, under the FFCA, B-5 has monitoring requirements for nitrates, total residual chlorine, total chromium and whole effluent toxicity in addition to those parameters already found in the NPDES permit. We therefore request that monitoring be performed at Pond B-5 in accordance with NPDES/FFCA discharge requirements during transfers to A-4. We further request that these results be reported on the discharge monitoring reports for the appropriate month, and that the cover letter for these reports note that the information refers to a transfer and not to a direct discharge of Pond B-5. Given these conditions, EG&G is authorized to resume transfer of water from Pond B-5 to Pond A-4.

The proposed transfer from Ponds B-1 and B-2 to Pond A-2 may similarly be prohibited in light of the new FFCA requirements by Part III.1.a. of the NPDES permit. We proposed to Mr. Shankland that this transfer be allowed to proceed since A-2 is a non-discharging

ADMIN RECORD

SW-A-002916

DATE

ACTION

LIST

ETZKE, J.O.

KLINGAME, A.H.

APP, R.D.

OUCHER, D.W.

VIS, J.G.

ERED, J.E.

RRERA, D.W.

RDIS, L.R.

AIKOP, F.J.

ANCIS, G.E.

WOODWIN, R.

ALY, T.J.

EKER, E.H.

NS, J.P.

ELE, P.B.

RSH, J.M.

BY, W.A.

KERO, J.A.

E.E.M.

JESTIC, J.R.

THPWS, T.A.

URRENS, R.F.

RGAN, R.V.

ORTH, P.

LMER, L.A.

ZUTO, V.M.

OTTER, G.L.

OADES, J.L.

FFELL, B.F.

ANSON, E.R.

EGE, J.S.

ANKINSON, R.B.

LIAMS, R.E.

SON, J.M.

UNG, E.R.

NE, J.O.

OPPE, F.D.

EDS CONTROL

AREIC

Reviewed for Addressee

Corres. Control RFP

15-91 (AL)

DATE

BY

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

11/1/91

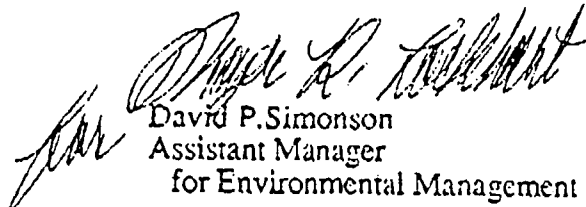
11/1/91

11/1/91

11/1/91

pond, the water there being spray evaporated. Mr. Shankland concurred with our proposal to do the transfer, under the condition that no discharge take place from A-2 to any of the downstream A-series ponds without permission from EPA. EG&G is therefore authorized to commence this transfer at any time, subject to this condition. Please advise us as soon as possible of any need that may arise for discharge from Pond A-2 so that we may seek permission from EPA for such a discharge.

If there are any questions in this matter, please feel free to contact me or have your staff contact Tom Lukow of my staff at extension 4561.


David P. Simonson
Assistant Manager
for Environmental Management

cc:

R. Shankland, EPA Region VIII
J. Bruch, CDH/RFP
T. Lukow, DOE
J. Rampe, DOE